

JUDGE GARDINER

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 3/16/18

UNITED STATES OF AMERICA

- v. -

YAMIL ANDRES GUERRERO DIAZ,

Defendant.

SEALED INFORMATION

18 Cr. _____ ()

18 CRIM 222

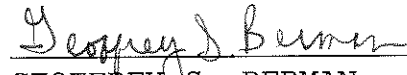
COUNT ONE

The United States Attorney charges:

1. Between at least in or about 2013 and on or about March 23, 2016, in the Southern District of New York and elsewhere, YAMIL ANDRES GUERRERO DIAZ, the defendant, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate commerce, and other facilities of interstate and foreign commerce with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate, other persons, and to engage in a course of conduct that placed those persons in reasonable fear of death and serious bodily injury, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to those persons, through the use of a dangerous weapon and resulting in the death of a person, and aided and abetted the same, to wit, GUERRERO DIAZ used cellphones, among other facilities of interstate and foreign commerce, to communicate

and conspire with a federal inmate ("CC-1") and others, as part of a course of conduct in which CC-1 caused GUERRERO DIAZ and others to surveil, harass, threaten, and injure two people ("Victim-1" and "Victim-2") and to hire and attempt to hire others to kill Victim-2, resulting in Victim-2's death.

(Title 18, United States Code,
Sections 2261A(2), 2261(b)(1) & (3), and 2.)



GEOFFREY S. BERMAN
United States Attorney

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2261A(2), 2261(b)(1) & (3), and 2.)

GEOFFREY S. BERMAN

United States Attorney.
